

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Jonathan Montrel Jones, Debtor

Case No. 25-50589-KMS  
CHAPTER 13

**NOTICE OF FILING CHAPTER 13 PLAN AND MOTIONS FOR VALUATION AND  
LIEN AVOIDANCE**

The above-named Debtor has filed a *Chapter 13 plan and Motions for Valuation and Lien Avoidance* (the “Plan”) with the Bankruptcy Court in the above referenced case (see attachment).

Any objection to confirmation of the Plan or the motions contained therein shall be filed in writing with the Clerk of Court at Dan M. Russell, Jr. U.S. Courthouse, 2012 15th Street, Suite 244, Gulfport, MS 39501 on or before June 4, 2025. Copies of the objection must be served on the Trustee, US Trustee, Debtor, and Attorney for Debtor.

Objections to confirmation will be heard and confirmation determined on July 8, 2025 at 01:30 PM in the William Colmer Federal Building, 701 N. Main Street, Hattiesburg, MS 39401, unless otherwise ordered by the court. If no objection is timely filed, the Plan may be confirmed without a hearing.

Date: April 28, 2025

/s/ Thomas C. Rollins, Jr.  
*Thomas C. Rollins, Jr., Attorney for Debtor*

Thomas C. Rollins, Jr., MSB# 103469  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
trollins@therollinsfirm.com  
601-500-5533

**Fill in this information to identify your case:**

Debtor 1 Jonathan Montrel Jones  
Full Name (First, Middle, Last)

Debtor 2  
(Spouse, if filing) Full Name (First, Middle, Last)

United States Bankruptcy Court for the SOUTHERN DISTRICT OF MISSISSIPPI

Case number:  
(If known) \_\_\_\_\_

☐ Check if this is an amended plan, and list below the sections of the plan that have been changed.

\_\_\_\_\_

**Chapter 13 Plan and Motions for Valuation and Lien Avoidance**

12/17

**Part 1: Notices**

**To Debtors:** This form sets out options that may be appropriate in some cases, but the presence of an option on the form does not indicate that the option is appropriate in your circumstances or that it is permissible in your judicial district. Plans that do not comply with local rules and judicial rulings may not be confirmable. The treatment of ALL secured and priority debts must be provided for in this plan.

In the following notice to creditors, you must check each box that applies

**To Creditors:** Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated.

You should read this plan carefully and discuss it with your attorney if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

**If you oppose the plan's treatment of your claim or any provision of this plan, you or your attorney must file an objection to confirmation on or before the objection deadline announced in Part 9 of the Notice of Chapter 13 Bankruptcy Case (Official Form 309I). The Bankruptcy Court may confirm this plan without further notice if no objection to confirmation is filed. See Bankruptcy Rule 3015.**

The plan does not allow claims. Creditors must file a proof of claim to be paid under any plan that may be confirmed.

The following matters may be of particular importance. **Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked, the provision will be ineffective if set out later in the plan.**

1.1	A limit on the amount of a secured claim, set out in Section 3.2, which may result in a partial payment or no payment at all to the secured creditor	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included
1.2	Avoidance of a judicial lien or nonpossessory, nonpurchase-money security interest, set out in Section 3.4.	<input type="checkbox"/> Included	<input checked="" type="checkbox"/> Not Included
1.3	Nonstandard provisions, set out in Part 8.	<input checked="" type="checkbox"/> Included	<input type="checkbox"/> Not Included

**Part 2: Plan Payments and Length of Plan****2.1 Length of Plan.**

The plan period shall be for a period of 60 months, not to be less than 36 months or less than 60 months for above median income debtor(s). If fewer than 60 months of payments are specified, additional monthly payments will be made to the extent necessary to make the payments to creditors specified in this plan.

**2.2 Debtor(s) will make payments to the trustee as follows:**

Debtor shall pay \$623.25 (☐ monthly, ☐ semi-monthly, ☒ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the debtor's employer at the following address:

AAA Cooper Transportation  
1751 Kinsey Rd  
Dothan AL 36303-0000

Debtor Jonathan Montrel Jones

Case number \_\_\_\_\_

Joint Debtor shall pay \_\_\_\_ (☐ monthly, ☐ semi-monthly, ☐ weekly, or ☐ bi-weekly) to the chapter 13 trustee. Unless otherwise ordered by the court, an Order directing payment shall be issued to the joint debtor's employer at the following address:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**2.3 Income tax returns/refunds.**

Check all that apply

- ☒ Debtor(s) will retain any exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will supply the trustee with a copy of each income tax return filed during the plan term within 14 days of filing the return and will turn over to the trustee all non-exempt income tax refunds received during the plan term.
- ☐ Debtor(s) will treat income refunds as follows:  
 \_\_\_\_\_

**2.4 Additional payments.**

Check one.

- ☒ **None.** If "None" is checked, the rest of § 2.4 need not be completed or reproduced.

**Part 3: Treatment of Secured Claims****3.1 Mortgages. (Except mortgages to be crammed down under 11 U.S.C. § 1322(c)(2) and identified in § 3.2 herein.).**

Check all that apply.

- ☐ **None.** If "None" is checked, the rest of § 3.1 need not be completed or reproduced.

**3.1(a) Principal Residence Mortgages:** All long term secured debt which is to be maintained and cured under the plan pursuant to 11 U.S.C. § 1322(b)(5) shall be scheduled below. Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor, subject to the start date for the continuing monthly mortgage payment proposed herein.

**1** Mtg pmts to Cascade Financial  
 Beginning May 2025 @ \$1,085.00 ☒ Plan ☐ Direct. Includes escrow ☒ Yes ☐ No

**1** Mtg arrears to Cascade Financial Through April 2025 \$4,479.40

**3.1(b)** ☐ **Non-Principal Residence Mortgages:** All long term secured debt which is to be maintained and cured under the plan pursuant to 11 U.S.C. § 1322(b)(5) shall be scheduled below. Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor, subject to the start date for the continuing monthly mortgage payment proposed herein.

Property **-NONE-**  
 address: \_\_\_\_\_

Mtg pmts to \_\_\_\_\_  
 Beginning month @ \_\_\_\_\_ Plan Direct. Includes escrow Yes No

Property **-NONE-** Mtg arrears to \_\_\_\_\_ Through \_\_\_\_\_

**3.1(c)** ☐ **Mortgage claims to be paid in full over the plan term:** Absent an objection by a party in interest, the plan will be amended consistent with the proof of claim filed by the mortgage creditor.

Creditor: **-NONE-** Approx. amt. due: \_\_\_\_\_ Int. Rate\*: \_\_\_\_\_

Property Address: \_\_\_\_\_

Principal Balance to be paid with interest at the rate above: \_\_\_\_\_  
 (as stated in Part 2 of the Mortgage Proof of Claim Attachment)

Portion of claim to be paid without interest: \$ \_\_\_\_\_  
 (Equal to Total Debt less Principal Balance)

Special claim for taxes/insurance: \$ -NONE- /month, beginning month .  
 (as stated in Part 4 of the Mortgage Proof of Claim Attachment)

Debtor Jonathan Montrel Jones

Case number \_\_\_\_\_

\* Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District  
*Insert additional claims as needed.*

**3.2 Motion for valuation of security, payment of fully secured claims, and modification of undersecured claims. Check one..**

☒ **None.** If "None" is checked, the rest of § 3.2 need not be completed or reproduced.

**3.3 Secured claims excluded from 11 U.S.C. § 506.**

*Check one.*

☐ **None.** If "None" is checked, the rest of § 3.3 need not be completed or reproduced.

☒ The claims listed below were either:

(1) incurred within 910 days before the petition date and secured by a purchase money security interest in a motor vehicle acquired for the personal use of the debtor(s), or

(2) incurred within 1 year of the petition date and secured by a purchase money security interest in any other thing of value.

These claims will be paid in full under the plan with interest at the rate stated below. Unless otherwise ordered by the court, the claim amount stated on a proof of claim filed before the filing deadline under Bankruptcy Rule 3002(c) controls over any contrary amount listed below. In the absence of a contrary timely filed proof of claim, the amounts stated below are controlling.

Name of Creditor	Collateral	Amount of claim	Interest rate*
<b>Ally Financial, Inc</b>	<b>2020 Chevrolet Silverado 79000 miles</b>	<b>\$47,683.00</b>	<b>10.00%</b>

\*Unless otherwise ordered by the court, the interest rate shall be the current Till rate in this District.

*Insert additional claims as needed.*

**3.4 Motion to avoid lien pursuant to 11 U.S.C. § 522.**

*Check one.*

☒ **None.** If "None" is checked, the rest of § 3.4 need not be completed or reproduced.

**3.5 Surrender of collateral.**

*Check one.*

☐ **None.** If "None" is checked, the rest of § 3.5 need not be completed or reproduced.

☒ The debtor(s) elect to surrender to each creditor listed below the collateral that secures the creditor's claim. The debtor(s) request that upon confirmation of this plan the stay under 11 U.S.C. § 362(a) be terminated as to the collateral only and that the stay under § 1301 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in Part 5 below.

Name of Creditor	Collateral
<b>Tower Loan</b>	<b>Household Goods</b>

*Insert additional claims as needed.*

**Part 4: Treatment of Fees and Priority Claims****4.1 General**

Trustee's fees and all allowed priority claims, including domestic support obligations other than those treated in § 4.5, will be paid in full without postpetition interest.

**4.2 Trustee's fees**

Trustee's fees are governed by statute and may change during the course of the case.

**4.3 Attorney's fees.**

☒ No look fee: 4,000.00

Debtor **Jonathan Montrel Jones** Case number \_\_\_\_\_

Total attorney fee charged: **\$4,000.00**

Attorney fee previously paid: **\$2,622.00**

Attorney fee to be paid in plan per confirmation order: **\$1,378.00**

☐ Hourly fee: \$\_\_\_\_. (Subject to approval of Fee Application.)

**4.4 Priority claims other than attorney's fees and those treated in § 4.5.**

Check one.

- ☐ **None.** If "None" is checked, the rest of § 4.4 need not be completed or reproduced.
- ☒ Internal Revenue Service **\$4,484.04**
- ☐ Mississippi Dept. of Revenue **\$0.00**
- ☐ Other \_\_\_\_\_ **\$0.00**

**4.5 Domestic support obligations.**

☐ **None.** If "None" is checked, the rest of § 4.5 need not be completed or reproduced.

DUE TO: **Charlene Chapman**

POST PETITION OBLIGATION: In the amount of \$ **135.00** per month beginning **May 2025**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

PRE-PETITION ARREARAGE: In the amount of \$ **16,225.87** through **April 2025**

which shall be paid in full over the plan term, unless stated otherwise: **payroll deducted, not attempting to discharge**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

DUE TO: **Erica Brown**

POST PETITION OBLIGATION: In the amount of \$ **135.00** per month beginning **May 2025**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

PRE-PETITION ARREARAGE: In the amount of \$ **14,354.15** through **April 2025**

which shall be paid in full over the plan term, unless stated otherwise: **payroll deducted, not attempting to discharge**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

DUE TO: **Lakita Roberts**

POST PETITION OBLIGATION: In the amount of \$ **135.00** per month beginning **May 2025**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

PRE-PETITION ARREARAGE: In the amount of \$ **15,158.69** through **April 2025**

which shall be paid in full over the plan term, unless stated otherwise: **payroll deducted, not attempting to discharge**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

DUE TO: **Paris Jones**

POST PETITION OBLIGATION: In the amount of \$ **154.00** per month beginning **May 2025**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

PRE-PETITION ARREARAGE: In the amount of \$ **3,977.32** through **April 2025**

which shall be paid in full over the plan term, unless stated otherwise: **payroll deducted, not attempting to discharge**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

DUE TO: **Patrice Trotter**

POST PETITION OBLIGATION: In the amount of \$ **214.00** per month beginning **May 2025**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

PRE-PETITION ARREARAGE: In the amount of \$ **14,964.18** through **April 2025**

which shall be paid in full over the plan term, unless stated otherwise: **payroll deducted, not attempting to discharge**

To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.

DUE TO: **Zanetra Henderson**

Debtor Jonathan Montrel Jones

Case number \_\_\_\_\_

POST PETITION OBLIGATION: In the amount of \$ 200.00 per month beginning May 2025To be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.PRE-PETITION ARREARAGE: In the amount of \$ 4,477.10 through April 2025which shall be paid in full over the plan term, unless stated otherwise: payroll deducted, not attempting to dischargeTo be paid ☐ direct, ☒ through payroll deduction, or ☐ through the plan.*Insert additional claims as needed.***Part 5: Treatment of Nonpriority Unsecured Claims****5.1 Nonpriority unsecured claims not separately classified.**Allowed nonpriority unsecured claims that are not separately classified will be paid, pro rata. If more than one option is checked, the option providing the largest payment will be effective. *Check all that apply.*☐

The sum of \$

☒100.00 % of the total amount of these claims, an estimated payment of \$ 12,048.00☐

The funds remaining after disbursements have been made to all other creditors provided for in this plan.

If the estate of the debtor(s) were liquidated under chapter 7, nonpriority unsecured claims would be paid approximately \$0.00

Regardless of the options checked above, payments on allowed nonpriority unsecured claims will be made in at least this amount.

**5.2 Other separately classified nonpriority unsecured claims (special claimants). Check one.**☒**None.** If "None" is checked, the rest of § 5.3 need not be completed or reproduced.**Part 6: Executory Contracts and Unexpired Leases****6.1 The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory contracts and unexpired leases are rejected. Check one.**☒**None.** If "None" is checked, the rest of § 6.1 need not be completed or reproduced.**Part 7: Vesting of Property of the Estate****7.1 Property of the estate will vest in the debtor(s) upon entry of discharge.****Part 8: Nonstandard Plan Provisions****8.1 Check "None" or List Nonstandard Plan Provisions**☐**None.** If "None" is checked, the rest of Part 8 need not be completed or reproduced.*Under Bankruptcy Rule 3015(c), nonstandard provisions must be set forth below. A nonstandard provision is a provision not otherwise included in the Official Form or deviating from it. Nonstandard provisions set out elsewhere in this plan are ineffective.***The following plan provisions will be effective only if there is a check in the box "Included" in § 1.3.****Absent an objection, any Proof of Claim filed by the IRS and/or MS Dept. of Revenue shall be paid pursuant to the claim.****Part 9: Signatures:****9.1 Signatures of Debtor(s) and Debtor(s)' Attorney***The Debtor(s) and attorney for the Debtor(s), if any, must sign below. If the Debtor(s) do not have an attorney, the Debtor(s) must provide their complete address and telephone number.*X /s/ Jonathan Montrel JonesJonathan Montrel Jones

X \_\_\_\_\_

Signature of Debtor 2

Debtor **Jonathan Montrel Jones** Case number \_\_\_\_\_

Signature of Debtor 1 \_\_\_\_\_

Executed on **April 23, 2025**

Executed on \_\_\_\_\_

**3461 Hwy 528**

Address \_\_\_\_\_

**Heidelberg MS 39439-0000**

City, State, and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

Address \_\_\_\_\_

City, State, and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

X **/s/ Thomas C. Rollins, Jr.**

**Thomas C. Rollins, Jr. 103469**

Signature of Attorney for Debtor(s) \_\_\_\_\_

**P.O. Box 13767**

**Jackson, MS 39236**

Address, City, State, and Zip Code \_\_\_\_\_

**601-500-5533**

Telephone Number \_\_\_\_\_

**trollins@therollinsfirm.com**

Email Address \_\_\_\_\_

Date **April 23, 2025**

**103469 MS**

MS Bar Number \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., attorney for the Debtor, do hereby certify that by filing the attached Notice and Chapter 13 Plan, I have caused the following parties to be served electronically via ECF:

Case Trustee  
Office of the US Trustee

I further certify that I have this day served a true and correct copy of the Notice and Chapter 13 Plan by US Mail, postage prepaid, to all other parties listed on the attached master mailing list (matrix).

Date: April 28, 2025

/s/ Thomas C. Rollins, Jr.  
*Thomas C. Rollins, Jr., Attorney for Debtor*

Thomas C. Rollins, Jr., MSB# 103469  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
trollins@therollinsfirm.com  
601-500-5533



UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

JONATHAN MONTREL JONES

CASE NO: 25-50589

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/28/2025, I did cause a copy of the following documents, described below,  
Notice and Plan

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/28/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

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2  
3  
4 UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

5 IN RE:  
6 JONATHAN MONTREL JONES

CASE NO: 25-50589

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13  
7  
8  
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11 On 4/28/2025, a copy of the following documents, described below,  
12 Notice and Plan  
13  
14  
15  
16  
17  
18

19 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient  
20 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth  
herein.

21 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above  
22 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of  
Service and that it is true and correct to the best of my knowledge, information, and belief.

23 DATED: 4/28/2025  
24  
25



26 Miles Wood  
27 BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
28 Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
NCRS ADDRESS DOWNLOAD  
CASE 25-50589  
SOUTHERN DISTRICT OF MISSISSIPPI  
MON APR 28 12-2-10 PST 2025

~~EXCLUDE~~

~~US BANKRUPTCY COURT  
DAN M RUSSELL JR US COURTHOUSE  
2012 15TH STREET SUITE 244  
GULFPORT MS 39501-2036~~

ACIMA  
9815 S MONROE ST  
SANDY UT 84070-4296

ALLY FINANCIAL INC  
ATTN BANKRUPTCY  
PO BOX 380901  
BLOOMINGTON IL 55438-0901

(P)CASCADE FINANCIAL  
BANKRUPTCY DEPT  
2701 E INSIGHT WAY  
STE 150  
CHANDLER AZ 85286-1930

CHARLENE CHAPMAN  
306 EMERALD LAKES DR  
APT 302  
HENRICO VA 23233-7119

ERICA BROWN  
21 COUNTY ROAD 395  
VOSSBURG MS 39366-5076

INTERNAL REVENUE SERVI  
CENTRALIZED INSOLVENCY  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

INTERNAL REVENUE SERVI  
CO US ATTORNEY  
501 EAST COURT ST  
STE 4430  
JACKSON MS 39201-5025

LAKITA ROBERTS  
33 COUNTY ROAD 3113  
HEIDELBERG MS 39439-3614

MSDHS  
ATTN CONSTANCE MORROW  
PO BOX 352  
JACKSON MS 39205-0352

ONEMAIN FINANCIAL  
ATTN BANKRUPTCY  
PO BOX 142  
EVANSVILLE IN 47701-0142

PARIS JONES  
131 COUNTY ROAD 5230  
HEIDELBERG MS 39439

PATRICE TROTTER  
1613 COUNTY ROAD 39  
LOUIN MS 39338

(P)TOWER LOAN  
P O BOX 320001  
FLOWOOD MS 39232-0001

US ATTORNEY GENERAL  
US DEPT OF JUSTICE  
950 PENNSYLVANIA AVENW  
WASHINGTON DC 20530-0001

~~EXCLUDE~~

~~UNITED STATES TRUSTEE  
501 EAST COURT STREET  
SUITE 6-430  
JACKSON MS 39201-5022~~

ZANETRA HENDERSON  
212 SUNFLOWER AVENUE  
HATTIESBURG MS 39402-9263

(P)DAVID RAWLINGS  
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE  
PO BOX 566  
HATTIESBURG MS 39403-0566

## DEBTOR

JONATHAN MONTREL JONES  
3461 HWY 528  
HEIDELBERG MS 39439-3509

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR  
THE ROLLINS LAW FIRM PLLC  
PO BOX 13767  
JACKSON MS 39236-3767~~